



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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Ref: 8EPR-N

**JUL 30 2013**

Malcolm Edwards  
Libby District Ranger  
Canoe Gulch Ranger Station  
12557 Hwy 37  
Libby, Montana 59923

RE: East Reservoir Project  
Draft Environmental Impact Statement,  
CEQ # 20130161

Dear Mr. Edwards:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321, *et seq.*, and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the June 2013 Draft Environmental Impact Statement (EIS) for the East Reservoir Project. This Draft EIS was prepared by the U.S. Department of Agriculture Forest Service (USFS) and considers land management activities, including timber harvest, fuel reduction in areas adjacent to private property, wildlife habitat enhancement, road storage and decommissioning, commercial thinning and precommercial thinning.

The East Reservoir Project area lies east of the Koocanusa Reservoir and is approximately 92,407 acres. Within the project there are: 78,546 acres National Forest System (NFS) land; 4,032 acres owned by the State of Montana Department of Natural Resource and Conservation (DNRC); 7,672 acres owned by Plum Creek Timber Company (PCTC); 802 acres owned by the US Army Corps of Engineers (COE); and 1,355 acres in private ownership.

Two action alternatives and a no-action alternative are analyzed in the Draft EIS. Included in the proposed action, Alternative 2 is:

- Commercial timber harvest on approximately 8,845 acres;
- Natural fuel reduction/stand improvement through hand slashing, grapple piling, chipping, mastication, or mechanical product removal on 1,378 acres;
- Construction of 9.2 miles of new permanent and approximately 4 miles of temporary road;
- Road reconstruction and implementation of best management practices (BMPs) to reduce road impacts to streams on approximately 176 miles of road;
- Long-term road storage for watershed rehabilitation and wildlife security on approximately 16 miles of road, including restoration of an estimated 49 stream crossings; and
- Conversion of about 37 miles of motorized trails to non-motorized for increase wildlife security.

## Comments

We offer the following comments related to water quality and resources, air quality, climate change and greenhouse gas, and human health.

### Water Quality and Resources

The Draft EIS states that under Alternative 2 (proposed action) and Alternative 3, there would be timber harvest, skid trail construction, temporary road construction, new road construction, upgrades to stream crossings, prescribed fire, and fuels and wildlife treatments. We appreciate the map depicting wetlands and the incorporation of design criteria, BMPs and RHCA guidelines are anticipated to minimize potential risks to water quality from the aforementioned activities.

The Draft EIS describes monitoring measures and includes a monitoring plan as an appendix. The latter indicates that monitoring during implementation of activities will occur. The Draft EIS also states that a number of the actions in the project will have short term impacts on streams. It would be helpful if the Final EIS linked how the monitoring during activity implementation will be used to minimize the impacts to streams. For instance, if an issue is found through the monitoring while an activity is being implemented, there are actions that will be taken to change the activity and minimize the impact. Including the list of actions in the Final EIS would provide a link between the monitoring and minimizing the impact.

### Air Quality

We appreciate that all prescribed burning would be carried out under the oversight of Montana/Idaho State Airshed Group and will comply with the current Federal and state management plans including the State Implementation Plan and Smoke Management Plan. It is known that smoke from fire contains air pollutants, including particulates (PM<sub>10</sub> and PM<sub>2.5</sub>) which can cause health problems, especially for people suffering from respiratory illnesses such as asthma, emphysema, or heart problems. The Draft EIS indicates that at the beginning of each burn season an advertisement informing the public of potential prescribed burns will be placed in a local paper. The draft EIS further states that residents near a prescribed burn may be contacted prior to a burn. We recommend the Final EIS include a commitment to notify the public closer to pending burns. This is especially important for the residents downwind of the burn areas.

Table 3.115 provides a range of particulate emissions factors (PM<sub>10</sub> and PM<sub>2.5</sub>) by burn type and alternative. The text provides an example of the range of PM<sub>10</sub> and PM<sub>2.5</sub> from a 40 acre underburn. The text also indicates that there is expected to be 300-2,000 acres of prescribed burn each year. In order for the maximum impact of these burns to be understood, we recommend the Final EIS include: (1) the total estimated project emissions over the life for the project, and (2) the potential estimated yearly highest PM<sub>10</sub> and PM<sub>2.5</sub> for the three alternatives using the "underburn timber harvest units," which has the highest PM<sub>10</sub> and PM<sub>2.5</sub> emissions per acre. For instance, using the information provided in text and tables, the maximum yearly PM<sub>10</sub> under alternative 2 is:

2774 pounds PM<sub>10</sub>/acres × 2,000 acres = 2774 tons per year.

We recognize that this assumes all 2,000 acres would be this burn type which may not be likely; however, it also informs the public of the worst case anticipated emissions. It would also be useful to disclose the largest likely area to be burned during a single event and how long such an event may last so the decision maker and public can understand short term (24-hour) impacts.

The Draft EIS includes a general discussion of cumulative air quality effects. Regional air quality data is available through Montana Department of Environmental Quality. In order to understand the cumulative impacts of the activities under the proposed alternative, the EPA recommends the Final EIS include the data on the current regional air quality and a more detailed analysis on cumulative air quality impacts.

### Climate Change and Greenhouse Gas Emissions

Information on current and project climate change impacts are included in the Vegetation Resource section of Chapter 3 includes as well as mentioned in several other Chapter 3 sections. We recognize that the inclusion of climate change as related to forest health and the proposed project is important. We recommend the discussion is expanded to include how the USFS can reduce the impacts of project activities on climate change, monitor for effects of climate change on forest resources, and include a project specific analysis and disclosure of greenhouse gas (GHG) emissions. To achieve this, the EPA suggests a four-step approach:

1. Quantify and disclose estimated annual and total project lifetime cumulative GHG emissions in CO<sub>2</sub>-equivalent terms and translate the emissions into equivalencies that are easily understood from the public standpoint (e. g., annual GHG emissions from x number of project equipment; see, <https://www.epa.gov/RDEE/energy-resources/calculator.html>).
2. Qualitatively discuss the link between GHGs and climate change, in addition to the potential impacts of climate change.
3. Include a summary of ongoing and projected regional climate change impacts relevant to the project area based on U.S. Global Change Research Program assessments.
4. Identify and analyze reasonable alternatives and/or way to mitigate project-related GHG emissions.

### Human Health as Part of the Environment

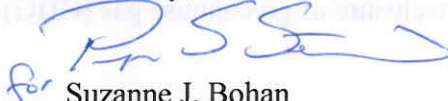
The East Reservoir Project lies within 20 miles of the WR Grace Vermiculite mine. Based on current data from the Libby Superfund Site, there is the potential for asbestos related impacts in the project area. Although the risk from asbestos in the area is not yet quantified, we suggest that the Final EIS include: (1) a discussion of possible asbestos in the project area contamination; and (2) the potential impacts of such contamination, especially as they relate to workers' health for the cutting and burning projects included in the preferred alternative. Additionally, it is important that the Final EIS included mitigation measures that would be employed to avoid any identified potential impacts.

## Rating and Recommendations

Consistent with Section 309 of the CAA, it is the EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project. Based on the procedures the EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action, the EPA is rating this Draft EIS as Environmental Concerns-Insufficient Information, (EC-2). The "EC" rating indicates that the EPA review has identified environmental impacts that need to be avoided in order to fully protect the environment. The "2" rating indicates that the EPA has identified a need for additional information, data, analyses or discussion in the Final EIS in order for the EPA to fully assess environmental impacts from the proposed project. A full description of the EPA's rating system is enclosed.

We hope that our comments will assist you in clarifying the environmental impacts and mitigation measures for this project. We appreciate the opportunity to review and comment on the Draft EIS. If we may provide further explanation of our comments, please contact me at 303-312-6925 or Lisa Lloyd at 303-312-6537.

Sincerely,



Suzanne J. Bohan  
Director, NEPA Compliance and Review Program  
Office of Ecosystems Protection and Remediation

Enclosure: EPA's Rating System Criteria



## **U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements**

### **Definitions and Follow-Up Action\***

#### **Environmental Impact of the Action**

**LO -- Lack of Objections:** The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC -- Environmental Concerns:** The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO -- Environmental Objections:** The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU -- Environmentally Unsatisfactory:** The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

#### **Adequacy of the Impact Statement**

**Category 1 -- Adequate:** EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 -- Insufficient Information:** The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new, reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 -- Inadequate:** EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

